

EXHIBIT P

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

MANIKANTA PASULA, et al,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, et al,

Defendants.

Case No.

DECLARATION OF HAORYANG AN

I, Haoyang An, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Haoyang An and I am over the age of 18.
2. I am citizen of People's Republic of China. I live in Massachusetts.
3. I first came to United States for an undergraduate program at the University of Connecticut on August 18, 2018. I declared a major of Applied Mathematics and minor in Economics.
4. I graduated on August 24, 2022 for the Bachelor of Arts in Applied Mathematics.
5. On September 5, 2022, I started my first Master's degree at Boston University.
6. On May 19, 2024, I obtain the Master of Science in Applied Business Analytics.
7. On August 22, 2024, I started my second Master's degree at Worcester Polytechnic Institute (WPI). I have been studying Data Science major. I have had one semester at WPI already and now it's my second semester. I still have one more semester left to finish the degree. And I was planning to apply for a PhD program at WPI next semester.
8. I have paid a \$186,000 tuition fee for undergraduate school (University of Connecticut), a \$112,000 tuition fee for my first Master's degree at Boston University, and a

\$31,196 tuition fee for my second Master's degree at WPI.

9. On September 21, 2023, I hit a car with my car from the rear at around a speed of 10 mph. At that time, due to my unawareness of the expiration of my car insurance and Massachusetts law, the police officer came and told me that I had to go to court. The officer also said that the court would send me a mail to inform me about the date and time for the hearing.

10. To fix my mistake, I actively contacted my insurance company and obtained my car insurance on September 25, 2023. However, I never received any mail from the court in the following three months.

11. One day, while I was driving my car to a train station, a police officer pulled me over because my car stepped on the lane while making a left turn. I stayed in the car for 30 minutes, and the police officer asked me to get out of the car. After that, the officer arrested me for failure to attend the hearing on the expired car insurance. The police officer took me to police station and collected my fingerprint. I paid \$100 cash for bail. Before letting me leave, the police officer gave me a note with a specific time and date for me to go to court.

12. On January 3, 2024 at 8:00am, I went to the court. My case was the first case that day, and I did not even say anything before the judge who told me that my case was dismissed and I was free to leave.

13. On April 9, 2025, WPI Internation House staff called me and informed me that my F-1 student status in the SEVIS record was terminated based on the following reason: "OTHER – Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated."

14. On April 14, 2025, I received an email from the U.S. Embassy in Beijing, China that my visa was revoked.

15. In light of the termination, it is a challenging and stressful time for me. I still have plans for applying PhD program in United States. As a first year student in WPI, I still have one more semester left to obtain the degree. For my major Data Science, I still need to finish a Graduate Qualifying Project (GQP) qualifying course to graduate, which is an in-person course which is a 3-credit project, typically done in teams that are carried out in cooperation with a sponsor or industrial partner. It will be overseen by a faculty member affiliated with the Data Science Program and will offer integrated theory and practice of Data Science, including the utilization of tools and techniques acquired in the Data Science Program. In this situation, I might not be able to attend the GQP course in person since my F-1 student status in SEVIS is being terminated. This termination further jeopardizes my PhD program application in the future because of the possible out of student status.

16. Further, in light of the termination, I will not be able to participate in the Optional Practical Training (OPT).

17. I also worry about the possible immigration detention and deportation. Without having any valid student status, I fear that I could be detained and lose my ability to finish my degree and not pursue my future academic path.

18. I have maintained my student status through my F-1 student status including attending full course of studies.

19. I have not engaged in any unauthorized employment in the United States.

20. I have been truthful to U.S. government officials.

21. I have not been convicted of any crime of violence in the United States.

22. I am not aware that the U.S. government put me in the federal register to terminate my F-1 student status.

23. I want to be a named plaintiff in this case. I understand that, as a class representative, it would be my responsibility to represent the interests of all the class members in this lawsuit, and not just my own personal interests. I also understand the need to stay informed about what is happening in the case.

24. I understand that I am agreeing to represent many students and graduates like me. I declare under penalty of perjury that the foregoing is true and correct.

Haoyang An
Haoyang An
Executed on April 16, 2025.